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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

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15 UNITED STATES OF AMERICA,) CR No.: CR 06-0783 JSW
16 Plaintiff,)
17 v.) STIPULATION AND [PROPOSED]
18 JOSE MERAS-SOTO,) ORDER EXCLUDING TIME
19 Defendant.)

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21 On December 14, 2006, the parties in this case appeared before the Court and stipulated that
22 time should be excluded from the Speedy Trial Act calculations from December 14, 2006 to
23 February 1, 2007 in the interests of justice, for effective preparation of counsel, and for
24 consideration of a change of plea because defense counsel required time to obtain and review
25 additional information relevant to whether there will be a change of plea in this case. The parties
26 represented that granting the continuance was the reasonable time necessary for effective
27 preparation and consideration of a change of plea, taking into account the exercise of due
28 diligence. See 18 U.S.C. § 3161(h)(8)(B)(iv). The parties also agreed that the ends of justice

1 served by granting such a continuance outweighed the best interests of the public and the
2 defendant in a speedy trial. See 18 U.S.C. § 3161(h)(8)(A).

3 SO STIPULATED:

4 KEVIN V. RYAN
5 United States Attorney

6 DATED: December 21, 2006

7 /s/
JULIE A. ARBUCKLE
8 Assistant United States Attorney

9 DATED: December 21, 2006

10 /s/
GEOFFREY HANSEN
11 Attorney for Defendant Jose Meras-Soto

12 As the Court found on December 14, 2006, and for the reasons stated above, the Court finds
13 that the ends of justice served by the continuance outweigh the best interests of the public and the
14 defendant in a speedy trial and that time should be excluded from the Speedy Trial Act
15 calculations from December 14, 2006 to February 1, 2007 in the interests of justice and for
16 effective preparation of counsel. See 18 U.S.C. §3161 (h)(8)(A). The failure to grant the
17 requested continuance would deny counsel reasonable time necessary for effective preparation,
18 taking into account the exercise of due diligence, and would result in a miscarriage of justice.
19 See 18 U.S.C. §3161(h)(8)(B)(iv).

20 IT IS SO ORDERED.

21 DATED: January 3, 2007

22 Jeffrey S. White
United States District Judge